

EXHIBIT F.3

**UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

MARK SOKOLOW, et al.,

Plaintiffs,

Civ. No. 04-397 (GBD) (RLE)

v.

THE PALESTINE LIBERATION ORGANIZATION, et al.,

Defendants.

**SEVENTH REQUEST TO PRODUCE DOCUMENTS AND THINGS
BY ALL PLAINTIFFS
(Nos. 24-46)**

Pursuant to Rule 34 of the Federal Rules of Civil Procedure and the Local Rules of this Court, all Plaintiffs, by counsel, request that Defendants the Palestinian Authority (“PA”) and the Palestine Liberation Organization (“PLO”) produce the documents and things described below to Plaintiffs’ counsel within thirty (30) days of the service of these requests.

INSTRUCTIONS AND GENERAL DEFINITIONS

1. Defendants shall respond to these requests as required by the Federal Rules of Civil Procedure and the Local Rules of this Court.
2. The full text of the definitions and rules of construction set forth in Local Civil Rule 26.3(c) and (d) is incorporated by reference herein and governs these requests.

SPECIFIC DEFINITIONS

1. “PA” means and refers to defendant The Palestinian Authority and any ministry, agency, division, bureau, department or instrumentality thereof.
2. “PLO” means and refers to defendant The Palestine Liberation Organization and any agency, division, bureau, department or instrumentality thereof.

3. "Defendants" means and refers collectively to Defendants PA and PLO and any ministry, agency, division, bureau, department or instrumentality thereof.

4. "PA Martyr Form and File" in respect to any deceased or injured person, means and refers to the complete paper form and file regarding that person from the PA's Ministry of Social Affairs, or any predecessor or successor entity thereto. The documents produced by defendants as Bates 02:006827-34 are an illustrative example of a PA Martyr Form and File.

5. "PA Prisoner Form and File" in respect to any person who is or was a prisoner, means and refers to the complete paper form and file regarding that person from the PA's Ministry of Prisoner Affairs, or any predecessor or successor entity thereto. The existence of PA Prisoner Forms and Files was confirmed in the deposition of Jawad Amawi in the matter of *Klieman v. Palestinian Authority* at pp. 51; 64.

6. "PLO Martyr File" in respect to any deceased or injured person, means and refers to the complete paper file from the PLO's Social Affairs Institution, or any predecessor or successor entity thereto. The existence of PLO Martyr Files is evidenced by the document produced by defendants in the matter of *Gilmore v. Palestinian Authority* as Bates 06:000086.

REQUESTS FOR DOCUMENTS AND THINGS

23. The PA Martyr Form and File for each of the terrorists listed in Appendix 1.

24. The PLO Martyr File for each of the terrorists listed in Appendix 1.

25. All documents concerning all payments made and/or all financial or in-kind benefits provided by the PA and/or PLO to any person at any time after the death or injury of the terrorists listed in Appendix 1, in relation to, as a result of and/or due to their deaths or injuries.

26. All PA Prisoner Forms and Files created between January 1, 1994 and January 1, 2006, in which the prisoner is identified as belonging to Fatah.

27. All documents concerning all payments made and/or all financial or in-kind benefits provided by the PA and/or PLO to any person at any time, in relation to, as a result of and/or due to the imprisonment of the prisoners whose PA Prisoner Forms and Files are sought in Request No. 26.

28. All PA Prisoner Forms and Files created between January 1, 1994 and January 1, 2006, in which the prisoner is identified as belonging to Hamas.

29. All documents concerning all payments made and/or all financial or in-kind benefits provided by the PA and/or PLO to any person at any time, in relation to, as a result of and/or due to the imprisonment of the prisoners whose PA Prisoner Forms and Files are sought in Request No. 28.

30. Copies of all PA Martyr Forms and Files, PA Prisoner Forms and Files and/or PLO Martyr Files produced or disclosed by the defendants in any lawsuit in the United States.

31. All published and unpublished volumes, parts and drafts of the PA's "Al Aqsa Intifada: Diary and Documents" (انتفاضة الأقصى يوميات ووثائق) (sometimes also captioned as "Diaries of the Intifada" (يوميات الانتفاضة)), and all documents referenced, relied upon and/or utilized to create such volumes, parts and drafts.

32. All documents concerning all real properties located in Qalqilya that were used by Hamas for any purpose between January 1, 1994 and July 31, 2002, including without limitation all documents concerning the description, location, ownership, purchase and/or rental of such properties, the sources of all funds used to purchase and/or or rent such properties, and the uses to which such properties were put by Hamas.

33. All documents concerning all real properties located in Ramallah or Al Bireh that were used by Hamas for any purpose between January 1, 1994 and July 31, 2002, including

without limitation all documents concerning the description, location, ownership, purchase and/or rental of such properties, the sources of all funds used to purchase and/or or rent such properties, and the uses to which such properties were put by Hamas.

34. All documents concerning all real properties located in Jenin that were used by Hamas for any purpose between January 1, 1994 and July 31, 2002, including without limitation all documents concerning the description, location, ownership, purchase and/or rental of such properties, the sources of all funds used to purchase and/or or rent such properties, and the uses to which such properties were put by Hamas.

35. All documents concerning all real properties located in Tulkarem that were used by Hamas for any purpose between January 1, 1994 and July 31, 2002, including without limitation all documents concerning the description, location, ownership, purchase and/or rental of such properties, the sources of all funds used to purchase and/or or rent such properties, and the uses to which such properties were put by Hamas.

36. All documents concerning all real properties located in Nablus that were used by Hamas for any purpose between January 1, 1994 and July 31, 2002, including without limitation all documents concerning the description, location, ownership, purchase and/or rental of such properties, the sources of all funds used to purchase and/or or rent such properties, and the uses to which such properties were put by Hamas.

37. All documents concerning all real properties located in Hebron that were used by Hamas for any purpose between January 1, 1994 and July 31, 2002, including without limitation all documents concerning the description, location, ownership, purchase and/or rental of such properties, the sources of all funds used to purchase and/or or rent such properties, and the uses to which such properties were put by Hamas.

38. All documents concerning all real properties located in Jericho that were used by Hamas for any purpose between January 1, 1994 and July 31, 2002, including without limitation all documents concerning the description, location, ownership, purchase and/or rental of such properties, the sources of all funds used to purchase and/or or rent such properties, and the uses to which such properties were put by Hamas.

39. All documents concerning all real properties located in Bethlehem that were used by Hamas for any purpose between January 1, 1994 and July 31, 2002, including without limitation all documents concerning the description, location, ownership, purchase and/or rental of such properties, the sources of all funds used to purchase and/or or rent such properties, and the uses to which such properties were put by Hamas.

40. All documents concerning all real properties located in the Gaza Strip that were used by Hamas for any purpose between January 1, 1994 and July 31, 2002, including without limitation all documents concerning the description, location, ownership, purchase and/or rental of such properties, the sources of all funds used to purchase and/or or rent such properties, and the uses to which such properties were put by Hamas.

41. All documents concerning the capacity of the PA to sue or be sued.

42. All documents concerning the capacity of the PLO to sue or be sued.

43. All documents filed or served by the PA in any suit, petition or other legal proceeding that was initiated by the PA in any court between January 8, 2001, and today.

44. All documents filed or served by the PLO in any suit, petition or other legal proceeding that was initiated by the PLO in any court between January 8, 2001, and today.

45. In respect to any documents or information that the plaintiffs sought or seek to discover in this action regarding which the defendants claim a privilege under PA law – all

legislative or executive statutes, laws, ordinances, regulations, enactments and/or orders under which such privilege is claimed.

46. All documents utilized, examined and/or relied on by defendants in answering any interrogatory propounded by plaintiffs in this action.

August 28, 2012

Plaintiffs, by their Attorney,

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CERTIFICATION

I hereby certify that on August 28, 2012, I caused the within to be served by U.S. mail and electronic mail on the counsel listed below:

Brian A. Hill
MILLER & CHEVALIER CHARTERED
655 15th Street, NW, Suite 900
Washington D.C. 20005-6701

Robert J. Tolchin

APPENDIX 1

No.	Name of Suicide Terrorist	Date of Terrorist Attack
1.	Hamed Falah Mustafa Abu Hijlah	January 1, 2001
2.	Ziyad 'Arsan Hafez Kilani (survived)	March 1, 2001
3.	Ahmad Omar Hamdan 'Alian	March 4, 2001
4.	Dhiya' Hussein Muhammad Tawil	March 27, 2001
5.	Fadi 'Atallah Yussuf 'Amer	March 28, 2001
6.	Imad Kamel Sayid Zubeidi	April 22, 2001
7.	Mahmoud Ahmad Mahmoud Marmash	May 18, 2001
8.	Osama Nimr Darwish Abu al-Hija	May 25, 2001
9.	Ala Hilal 'Abd al-Sattar Sabah	May 25, 2001
10.	Sayid Hassan Hyssein Hutri	June 1, 2001
11.	Jihad Jawdat Muhammad Jarar	July 11, 2001
12.	Nidal Ibrahim Mustafa Abu Shaduf	July 16, 2001
13.	Murad Ahmed Muhammad Tawalbeh	July 22, 2001
14.	Muhammad Sa'id Abdallah Abu Khadr	August 2, 2001
15.	Izz al-Din Shuheil Ahmed al-Masri	August 9, 2001
16.	Muhammad Mahmoud Bakr Nasr (Daraghmeh)	August 12, 2001
17.	Ra'ed Nabil Ibrahim Barghouti	September 4, 2001
18.	Sheikh Muhammad Shaker Salah Hebesha	September 9, 2001
19.	Ahmed Abd al-Mun'em Ahmed Daraghmeh	October 7, 2001
20.	Muayyad Mahmoud Salah al-Din 'Iyadeh	November 8, 2001
21.	Samer 'Amer Ahmed As'ad	November 29, 2001
22.	Osama Muhammad 'Id Baher	December 1, 2001
23.	Maher Muhi al-Din Kamal Hebesha	December 2, 2001
24.	Dawud Ali Ahmed Sa'ad	December 5, 2001
25.	Nimer Muhammad Yussuf Abu Siffin	December 9, 2001

26.	Amjad Abd Rabo Ibrahim Fayad	December 12, 2001
27.	Ali Ibrahim Mahmoud Ashour	December 12, 2001
28.	Safwat 'Abd al-Rahman Muhammad Khalil	January 25, 2002
29.	Wafa' 'Ali Khalil Falyfel (Idris)	January 22, 2002
30.	Murad Muhammad 'Abd al-Fatah Abu 'Assal	January 30, 2002
31.	Nidhal Jowad Ta'er Surkaji	February 6, 2002
32.	Sadeq 'Ahid Mahmoud 'Abd al-Hafez	February 16, 2002
33.	Muhammad 'Abd al-Hamid Saleh Hamuda	February 17, 2002
34.	'Abd al-Jaber 'Abd al-Qadr Abd al-Jaber Khaled.	February 17, 2002
35.	Omar 'Abd al-Fatah Hafez Yassin	February 19, 2002
36.	Muhammad Tawfiq Muhammad Dar Yassin	February 22, 2002
37.	Muhammad Ahmad Abd al-Rahman Daraghmeh	March 2, 2002
38.	'Abd al-Kareem 'Issa Khalil Tahayinah	March 5, 2002
39.	Nidhal 'Id Tim Mashal	March 7, 2002
40.	Shadi Muhammad Sidqi Nasser	March 7, 2002
41.	Bilal Wajih Kamal Walid 'Ali	March 7, 2002
42.	Fuad Ismail Ahmad al-Hurani	March 9, 2002
43.	Akram Ishak 'Abdallah al-Nabatiti	March 17, 2002
44.	Rafat Tahsin Salim Najib Abu Diyak	March 20, 2002
45.	Muhammad Mashhur Muhammad al-Hashaykah	March 21, 2002
46.	'Inad Rashid Hussein Shqeirat	March 22, 2002
47.	'Abd al-Basset Muhammad Odeh	March 27, 2002
48.	Ayat Muhammad Lutfi al-Akhras	March 29, 2002
49.	Muhannad Ibrahim Fayadh Salahat	March 30, 2002
50.	Majdi 'Abd al-Jawad 'Abd al-Jabar Khanfar	March 30, 2002
51.	Fathi 'Amirah	March 30, 2002
52.	Shadi Zakariya Ridha Tubasi	March 31, 2002

53.	Jamil Khalaf Mustafa Hamid	March 31, 2002
54.	Rami Muhammad Hussein 'Issa al-Shawana	April 1, 2002
55.	Raghab Ahmad 'Izzat Jaradat	April 10, 2002
56.	'Andalib Khalil Muhammad Suliman Tqatqa	April 12, 2002
57.	'Muhammad Jamil Ahmad Mua'mar	May 7, 2002
58.	Zidan Muhammad Sayid Nimr Zidan	May 8, 2002
59.	Osama 'Adel Ahmad Bushkar	May 19, 2002
60.	'Issa 'Abd Rabbo Ibrahim Badir	May 22, 2002
61.	'Amer Muhammad 'Issa Shukani	May 24, 2002
62.	Jihad Ibrahim Saud Titi	May 27, 2002
63.	Hamzah 'Aref Hassan Samudi	June 5, 2002
64.	Imad Muhammad Ahmad Ziadeh	July 11, 2002
65.	Muhammad Haza' 'Abd al-Rahman al-Ghoul	July 18, 2002
66.	Sayid Waddah Hamid Awada	July 19, 2002
67.	Ibrahim Yasser Naji Walwil	July 17, 2002
68.	Muhammad Ismail Hassan 'Atallah	July 17, 2002
69.	Hizam 'Ata Yussuf Sarsara	July 30, 2002
70.	Jihad Khaled Hamada	August 4, 2002
71.	Muhammad Zaki Zakariya Asfar	August 6, 2002
72.	Marzuk Midhat 'Abd al-Latif Ghawarda	September 18, 2002
73.	Iyad Na'im Subhi Radad	September 19, 2002
74.	Rafik Muhammad 'Ali 'Abd al-Rahman Hamad	October 10, 2002
75.	Rafat Rashid 'Abdallah Muqdi	October 11, 2002
76.	Muhammad Fawzi Sa'adi/Hamada Hasanain	October 21, 2002
77.	Ashraf Salah Ahmad al-Asmar	October 21, 2002
78.	Muhammad Feisal Bustami	October 27, 2002
79.	Khaled Nabil Khamis Sawalha	November 4, 2002

80.	Na'il 'Azmi Musa Abu Halil	November 21, 2002
81.	'Alaa 'Ali 'Abdallah Karaki	December 28, 2002
82.	Buraq Rifat 'Abd al-Rahman Khalifa	January 5, 2003
83.	Samir 'Imad Muhammad al-Nouri	January 5, 2003
84.	Muhammad 'Umran Salim Qawasmeh	March 5, 2003
85.	Rami Muhammad Jemil Mutlaq Ghanem	March 30, 2003
86.	Muhammad Muhammad Khanil Yunis	April 15, 2003
87.	Ahmad Khaled Muhammad Ridha Khatib	April 24, 2003
88.	'Asef Muhammad Khanif ("Abu Muhammad")	April 30, 2003
89.	Omar Khan Sharif	April 30, 2003
90.	Fuad Jawad 'Umran Qawasmeh	May 17, 2003
91.	Bassem Jamal Darwish al-Takrouri	May 18, 2003
92.	Mujahid 'Abd al-Fatah Mustafa al-Masri Ja'bari	May 18, 2003
93.	Hiba 'Azem Sa'id Daraghmeh	May 19, 2003
94.	'Abd al-Mu'ti Muhammad Salih Muhammad Shabaana Tamimi	June 11, 2003
95.	Ahmad Khiri Fathi Yehia	July 7, 2003
96.	Ahmad 'Ali 'Abahara	July 19, 2003
97.	Hamis Ghazi Feisal Jaruwan	August 12, 2003
98.	Islam Yussuf Taleb Kteshat	August 12, 2003
99.	Raid 'Abd al-Hamid 'Abd al-Rizaq Musk	August 19, 2003
100.	Ihab 'Abd al-Kadir Mahmoud Abu Salim	September 9, 2003
101.	Ramez Fahmi Izz al-Din Abu Salim	September 9, 2003
102.	Hanadi Taysir 'Abd al-Malik Jaradat	October 4, 2003
103.	Sa'id (Tha'ir) Kamal Jamil Hanani	December 25, 2003
104.	Reem Saleh Mustafa Awad (Al-Riyashi)	January 14, 2004
105.	Ali Munir Yussuf Jaarah	January 29, 2004

106.	Muhammad Issa Khalil Zaghal	February 22, 2004
107.	Nabil Ibrahim Muhammad Mas'oud	March 14, 2004
108.	Muhammad Zuheir Mahmoud Salem al-Qassem	March 14, 2004
109.	Tareq Dhiyab Abd Hamid	April 28, 2004
110.	Ahmed Moussa Qaoud Abu Jamus	May 28, 2004
111.	Nassim Muhammad Ali Abd al-Ghani Ja'bari	August 31, 2004
112.	Ahmed Abu al-Afu Abd al-Fatah Qawasmeh	August 31, 2004
113.	Zeinab Ali Issa Abu Salem	September 22, 2004
114.	Amer Abd al-Rahim Ahmed Ali Abdallah (Amer al-Far)	November 1, 2004
115.	Abdallah Sa'id Ibrahim Badran	February 25, 2005
116.	Ahmed Sami Abu Khalil	July 12, 2005
117.	Abd al-Rahman Qaisiya	August 12, 2005
118.	Hassan Ahmed Hassan Abu Zeid	October 26, 2005
119.	Lutfi Amin Abd al-Latif Abu Sa'ada	December 5, 2005